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July 10, 2002

VIA HAND DELIVERY

The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

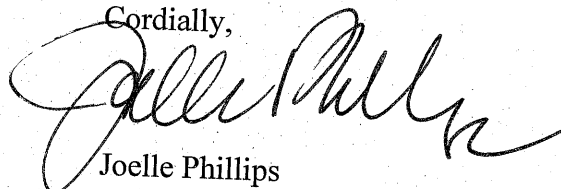
Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to
Declare Switching an Unrestricted Unbundled Network Element*
Docket No. 02-00207

Dear Chairman Kyle:

Enclosed herein for filing, please find the original and fourteen copies of BellSouth's non-proprietary responses to the UNE-P Coalition's Data Requests. Copies of the enclosed have been provided to counsel of record.

The Hearing Officer's order resolving motions to compel held in abeyance the motion to compel response to the Petitioners' request number 14, pending clarification of that request. The parties were directed to notify the Authority of the status of the discovery dispute on July 2, 2002. The Authority was not accepting filings on that day due to the government shut-down. BellSouth has not yet received either the clarification of a revised discovery request. BellSouth has not responded to this request pending receipt of this clarification.

Cordially,



Joelle Phillips

JP/jej

Enclosure

REQUEST: Please provide, for each year since 1996, and quarterly since January 1, 1999, the following statistics in Tennessee:

- a. The number of minutes that BellSouth terminated for CLECs (i.e., interconnection minutes that originated on CLEC switches and terminated with BellSouth customers);
- b. The number of minutes that CLECs terminated for BellSouth (i.e., interconnection minutes that originate with BellSouth customers and terminated on the CLEC network);

RESPONSE: No data was available for the time period before December 1997. In response to Item No. 4a, please see the chart below.

MONTH	MOU
Dec-97	6,514,855
Jan-98	13,982,741
Feb-98	14,979,730
Mar-98	15,895,780
Apr-98	18,647,113
May-98	19,348,294
Jun-98	23,423,815
Jul-98	27,578,063
Aug-98	29,984,829
Sep-98	27,828,484
Oct-98	26,018,112
Nov-98	31,181,337
Dec-98	28,729,241
SUM 1998	277,597,539

MONTH	MOU
1Q99	94,039,275
2Q99	140,163,445
3Q99	140,752,512
4Q99	142,505,261
1Q00	152,716,188
2Q00	199,166,821
3Q00	201,538,775
4Q00	240,202,547
1Q01	263,545,646
2Q01	214,239,303
3Q01	205,870,808
4Q01	221,173,962
1Q02	286,476,723
Apr-02	102,345,839
May-02	105,594,479

RESPONSE: (Continued)

In response to Item No. 4b, please see the attached chart for usage terminated in Tennessee. No data was available for the period prior to 1998.

Total MOU's CLEC's Terminated for BellSouth in Tennessee

Year	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Annual
1998					
1999	1,122,019,916	1,269,469,316	1,731,384,288	1,871,491,764	2,009,901,964
2000	2,382,693,188	2,394,646,876	2,511,952,286	2,802,739,841	5,994,365,284
2001	3,084,790,344	2,928,988,722	3,100,932,456	3,300,843,152	10,092,032,191
					12,415,554,674

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 02-00207
UNE-P Coalition's 1st Data Requests
May 24, 2002
Item No. 5
Page 1 of 1

REQUEST: Provide all documents used to obtain management approval for the "BellSouth Connect and Grow Promotion" (i.e., BellSouth's promotion that required the customer to upgrade to a four-line package).

RESPONSE: BellSouth has no documents responsive to this request.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 02-00207
UNE-P Coalition's 1st Data Requests
May 24, 2002
Item No. 7
Page 1 of 1

REQUEST: Identify all terms, conditions, discounts and prices that comprised the
"BellSouth Connect and Grow Promotion."

RESPONSE: Please see the attached.



BellSouth Telecommunications, Inc.
Room 22B22
333 Commerce Street
Nashville, Tennessee 37201-3300

615-214-3815
Fax 615 214-8867

Jim Gotto
Manager
Regulatory

April 25, 2000

Ms. Darlene Standley
Regulatory Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Dear Ms. Standley:

From May 15, 2000 through August 11, 2000 2 and 3 line business customers in Rate Group 5 areas who bill less than \$10,000 per month per location in BellSouth® revenues will be eligible for the following:

Existing 2 line customers initiating an order for 2 additional lines within a BellSouth® Complete Choice® for Business Term Plan will receive a waiver of; twelve month's recurring charges for one of the new lines and A4 Service Connection Charges for both of the new lines.

Existing 3 line customers initiating an order for 1 additional line within a BellSouth® Complete Choice® for Business Term Plan will receive a waiver of; four month's recurring charges for the new line and A4 Service Connection Charges for the new line.

Please call me at 214-3815 if additional information is needed.

Yours truly,



Manager

bcc: Sherry Bircheat
Conrad Martin
Scott Bailey
Ed Matejick
Tom Walden
Bonnie O'Bannon
Kathy Hammack

April 20, 2000

TO: Jim Gotto, Manager - Regulatory (TN)
FROM: Sherry Bircheat, Manager - Customer Markets/Market Pricing Strategy
SUBJECT: New Lines Promotion

Please make arrangements for the following promotion: The New Lines promotion will be offered from May 15 through August 11, 2000, to existing two and three line business customers (Flat Rate service and Business Plus^R service) in Rate Group 5 in Tennessee.

Existing 2 line customers initiating an order for 2 additional lines within a Complete Choice for Business Term Plan during the promotional period will receive 12 months recurring charges waived on one of the new lines and the A4 Service Connection Charges will be waived for both lines. Existing 3 line customers initiating an order for 1 additional line within a Complete Choice for Business Term Plan during the promotional period will receive 4 months recurring charges waived on the new line and the A4 Service Connection Charge will be waived. This promotion is limited to business customers in Rate Group 5 who bill less than \$10,000 per month per customer location.

I can be reached at 205/853-4426 if you need additional information or have questions. I have attached the general promotion description for your use.

Attachment

cc: Conrad Martin
Scott Bailey
Ed Matejick
Bonnie O'Bannnon
Kathy Hammack
Tom Walden

^R Registered Service Mark of BellSouth Intellectual Property Corporation

NewInTN.doc

Small Business Additional Lines Promotion

Executive Summary

This proposal recommends a promotion to stimulate customer interest of additional business lines from BellSouth among Small Business customers. This offer will be extended to eligible customers in the following areas:

City	State
Atlanta	GA
Charlotte	NC
Ft Lauderdale	FL
Greensboro	NC
Miami	FL
Nashville	TN
New Orleans	LA
Orlando	FL

The offer will be effective from May 15-Aug 11, 2000. This offer is not eligible to be combined with any other offer.

Promotional Concept

Existing 2 line customers initiating an order for 2 additional lines within a Complete Choice for Business Term Plan during the promotional period are eligible for the 2-Line offer listed below.

2-Line Offer

Eligible Customers	Purchase	Monthly Recurring Offer	Non-Recurring Offer
Existing 2 Line Customer	2 Additional Lines Purchased	12 Months Waived on 1 of New Lines	Primary Connection Charge Waived for Both Lines

Existing 3 line customers initiating an order for 1 additional line within a Complete Choice for Business Term Plan during the promotional period are eligible for the 1-Line offer listed below.

1-Line Offer

Eligible Customers	Purchase	Monthly Recurring Offer	Non-Recurring Offer
Existing 3 Line Customer	1 Additional Line Purchased	4 Months Waived on the New Line	Primary Connection Charge Waived

Additional business lines are defined as Flat Rate and Business Plus lines.

This promotion has three primary objectives:

- 1) Increase additional lines penetration
- 2) Increase customer loyalty through increasing their ability to manage their calls more efficiently
- 3) Remove barriers to adding additional business lines

Customer Eligibility

This promotion is extended to existing customers based on the criteria listed above. This offer will be applicable "C" and new services ordered on "T" orders. "N" orders will not qualify for these promotional offers. ("N" orders are defined as new customers) This promotion is limited to business customers who bill less than \$10,000 per month per customer account.

Sales Channels

All small business channels will support this promotion. The direct mail will encourage customers to call into a dedicated 3rd Party group designated to support this promotion.

Promotion Period

This promotion is recommended to run from May 15-Aug 11, 2000.

Newlines.doc

10:



Company:

FAX #:

>>> connect >> and create something

From:

www.smlbiz.bellsouth.com/connect

Date:

> **grow** >>

your business with Additional Lines from BellSouth® and save!

Increase your accessibility and your opportunities with Additional Lines¹ from BellSouth. You'll stay in touch with customers whether you're managing heavy call volumes, faxing or connecting to the Internet.

Because you're a valued customer, we're offering you the BellSouth® Connect and Grow plan, which features savings on the products and services you need to accommodate your growth.

Special limited time offer: 2-line customers can get 4 lines for the price of 3.

Purchase 2 Additional Lines from BellSouth and you'll get:

- 4th line at no additional cost for 1 year
- connection charges waived on both lines

Save even more with the BellSouth® Connect and Grow plan!

Your purchase of 2 Additional Lines automatically enrolls you in the BellSouth® Connect and Grow plan, which includes:

BellSouth® Complete Choice® for Business²

- Simple, economic toll calling plan
- Unlimited selection of over 20 enhanced calling features
- Choice of optional voice messaging and/or fax messaging services
- Choice of optional maintenance plan for your phone and/or inside wiring
- Choice of 24 or 36 month term plans — receive substantial discounts depending upon term plan chosen

You can also enjoy the rewards of BellSouth Select BusinessSM program membership³

- 500 bonus points deposited in your Select Business account at time of enrollment for dollars off your BellSouth bill and for products and services
- Special offers on a variety of BellSouth products and services
- Personalized customer service by dialing one number for service on all your BellSouth accounts
- Discounts from BellSouth Select BusinessSM Program Partners, including Business Services, Travel Services, Personal Services and Business Publications

HURRY! This special limited time offer expires August 11, 2000!

¹Promotional offer good June 1 through August 11, 2000. Offer good for up to 2 business lines. Offer limited to business customers. Normal service charge will apply. Other terms and conditions may apply.

²BellSouth® Complete Choice® for Business Local Package: Customer must purchase messaging package to be eligible to purchase maintenance package. BellSouth® Complete Choice® for Business Local Package includes unlimited calling within your basic local calling area and a per minute charge for calls in the expanded local calling area, except Florida, which does not include an expanded local calling plan. Service order charge does not apply to existing customers. If customer cancels BellSouth® Complete Choice® for Business Local Package, all discounts associated with the package will be discontinued and pricing shall be at BellSouth's standard rate; customer is responsible for reimbursement of discounted charges that the customer received as a result of customer participation in the program. Customer must elect a 24 or 36 month plan pursuant to tariff. Features must be compatible and subject to availability. Some features work only for calls dialed directly between customers who bill.

³Eligibility in the BellSouth Select BusinessSM program requires the participation or purchase of a non-regulated service provided by a BellSouth affiliate. Credit is applied to non-regulated portion of the bill.

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REQUEST: Please supply all tariff references (and copies of relevant tariff pages) that described the "BellSouth Connect and Grow Promotion." If this promotion was not tariffed, why was it not a tariffed offering?

RESPONSE: The BellSouth "Connect and Grow Promotion" was filed as a promotion and not as a tariff. Please see documents provided in BellSouth's Response to UNE-P Coalition's 1st Data Requests, Item No. 7 above, for a copy of the package that was filed with the Tennessee Regulatory Authority prior to implementation of this promotion.

REQUEST: With respect to the "BellSouth Connect and Grow Promotion" in Tennessee:

- a. When was the BellSouth Connect and Grow Promotion offered in Tennessee?
- b. How many customers subscribed to the BellSouth Connect and Grow Promotion in Tennessee?
- c. Does BellSouth still offer the BellSouth Connect and Grow Promotion in Tennessee?

RESPONSE: a. May 15, 2000 – August 11, 2000.

- b. BellSouth is attempting to determine the answer to this question and, to the extent that it is able to determine the answer, BellSouth will supplement this response.
- c. No.

REQUEST: How much time does BellSouth assume, for planning and workload management purposes, it will take a technician to complete a "hot-cut" for a single analog line customer? If a customer has multiple lines, how is the time to complete the hot-cut estimated?

RESPONSE: BellSouth estimates that it takes a technician approximately 15 minutes to perform the actual work associated with a "hot-cut" for a single line customer. This time does not include the time associated with performing other tasks associated with a hot cut, including, but not limited to order coordination at the central office, testing after the work is completed, and joint testing with the CLEC. BellSouth estimates the same amount of time to perform a "hot-cut" for a multi-line customer when such lines are SL1 lines in close proximity on the frame.

REQUEST: How many BellSouth employees in Tennessee are trained to perform "hot-cuts"?

RESPONSE: The following is the number of Tennessee employees that are trained to perform "hot-cuts":

Central Office	244
Installation and Maintenance/ Special Services Installation and Maintenance	295
TOTAL	539

REQUEST: In 2001, what was BellSouth's churn rate in Tennessee for
(1) residential customers,
(2) single-line business customers, and
(3) businesses customers with between two and 24 voice lines, inclusive.

RESPONSE: See BellSouth's Objections to UNE-P Coalition's 1st Set of Data Requests
filed May 31, 2002.

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

- ☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

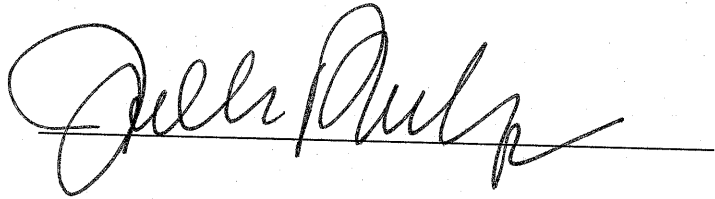
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Gig Harbor, WA 98335

A handwritten signature in cursive script, appearing to read "J. Paul", is written over a horizontal line.